

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTOPHER JASON GRANT	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CHRISTOPHER JASON GRANT	:	
Respondent	:	CASE NO. 1-23-bk-01032

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 8<sup>th</sup> day of June, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Debtor's plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required. More specifically,

Trustee alleges and avers that debtor's disposable income is greater than that which is committed to the plan based upon the Means Test calculation and specifically disputes the following amounts:

- a. Charitable contributions (verification) – Line 31.
- b. Line 46 should provide for an increase in income from that reported on Line 2. The debtor's actual income is \$8,296.00 a month.
- c. Line 23 - \$100.00 additional phone expense is unnecessary.

2. Failure to properly state the minimum amount to be paid to unsecured creditors in Section 1.A.4. of the plan, as required by the Mean Test.

3. The Trustee avers that debtor's plan is not feasible based upon the following:

- a. The plan is underfunded relative to claims to be paid.
- b. The debtor is unable to make payments under the plan, contrary to § 1325(a)(6). The proposed step plan is unrealistic.

4. The Trustee provides notice to the Court as to the ineffectiveness of debtors' Chapter 13 Plan for the following reasons:

- a. The plan incorrectly states that debtor is under median.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

#### CERTIFICATE OF SERVICE

AND NOW, this 15th day of June, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kara Gendron, Esquire  
125 State Street  
Harrisburg, PA 17101

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee